

1 Joseph W. Cotchett (#36324)
 2 Steven N. Williams (#175489)
 2 Nanci E. Nishimura (#152621)
 3 Aron K. Liang (#228936)
 3 Douglas Y. Park (#233398)
COTCHETT, PITRE & McCARTHY
 4 San Francisco Airport Office Center
 5 840 Malcolm Road, Suite 200
 Burlingame, CA 94010
 Telephone: (650) 697-6000
 Facsimile: (650) 697-0577
jcotchett@cpmlegal.com
sWilliams@cpmlegal.com
nnishimura@cpmlegal.com
aliang@cpmlegal.com
dpark@cpmlegal.com

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 10 *Attorneys for Plaintiffs Donald Wortman,
 William Adams, Margaret Garcia and the
 Proposed Class*

11 *Additional Counsel on Signature Page*

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 13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **DONALD WORTMAN, WILLIAM)** **Case No. 07-cv-05634-EDL**
 16 **ADAMS, MARGARET GARCIA,)**
 17 **individually and on behalf of all others)**
 17 **similarly situated,)**

18 **Plaintiffs,)**

19 **vs.)**

20 **AIR NEW ZEALAND, ALL NIPPON)**
 21 **AIRWAYS, CATHAY PACIFIC)**
 21 **AIRWAYS, CHINA AIRLINES, EVA)**
 22 **AIRWAYS, JAPAN AIRLINES)**
 22 **INTERNATIONAL, MALAYSIA)**
 22 **AIRLINES, NORTHWEST AIRLINES,)**
 23 **QANTAS AIRWAYS, SINGAPORE)**
 23 **AIRLINES, THAI AIRWAYS,)**
 24 **UNITED AIRLINES,)**

25 **Defendants.)**

**JOINT STIPULATION PURSUANT TO
 LOCAL RULE 6-1 AND [PROPOSED]
 ORDER EXTENDING TIME TO
 RESPOND TO COMPLAINTS IN
 RELATED ACTIONS**

The Honorable Elizabeth D. Laporte
 Complaint filed November 6, 2007

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**JOINT STIPULATION PURSUANT TO LOCAL RULE 6-1 AND [PROPOSED] ORDER
 EXTENDING TIME TO RESPOND TO COMPLAINTS IN RELATED ACTIONS
 Case No. 07-cv-05634-EDL**

1 Pursuant to Local Rule 6-1(a), in light of the transfer motion now pending before the
 2 Judicial Panel on Multidistrict Litigation (“JPML”), Plaintiffs Daniel Wortman, William Adams
 3 and Margaret Garcia (“Plaintiffs”) and Defendant Northwest Airlines (“Defendant”), through its
 4 counsel, hereby stipulate and agree as follows:

5 **IT IS HEREBY STIPULATED AND AGREED** that Defendant’s time to answer, move
 6 or otherwise plead is enlarged until the later of (1) the date when the Defendant would otherwise
 7 be required to a file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days
 8 after the JPML grants, denies, or otherwise disposes of the pending motion. If a consolidated
 9 amended complaint is filed by all plaintiffs in a single transferee Court and served on Defendant,
 10 Defendant’s time to answer, move, or otherwise plead is enlarged until 45 days after such
 11 service.

12 **WHEREAS** Plaintiffs further agree that the deadline to respond to the Complaint of any
 13 other cases subsequently related or transferred to this Court shall be extended until the later of
 14 the following two dates: (1) the date when the Defendant would otherwise be required to file a
 15 response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days after the JPML grants,
 16 denies, or otherwise disposes of the pending motion;

17 **WHEREAS** Plaintiffs further agree that this extension is available, without further
 18 stipulation with counsel for Plaintiffs, to all named Defendants who notify Plaintiffs in writing of
 19 their intention to join this extension. Any named Defendant who agrees to join this extension
 20 also agrees to each of the provisions of the paragraph below concerning service.

21 **IT IS FURTHER STIPULATED AND AGREED** that each defense counsel shall accept
 22 service on behalf of the Defendant of the summons and complaints in the above-captioned
 23 matter, including any amended or consolidated complaints, and further, that such Defendant shall
 24 not contest sufficiency of process or service of process. This Stipulation does not constitute a
 25 waiver of any other defense including, but not limited to, the defenses of lack of personal or
 26 subject matter jurisdiction or improper venue. Nothing in this paragraph shall obligate any
 27 Defendant to answer, move or otherwise respond to any complaint until the time provided in the
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1 preceding paragraphs. The above notwithstanding, should any Defendant, except pursuant to
2 court order, respond to any complaint in a related matter filed in another United States District
3 Court prior to the date contemplated by this stipulation, then such Defendant shall make a
4 simultaneous response to the complaint in the above-captioned matter.

5 IT IS SO STIPULATED

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7 Respectfully Submitted,

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9 Dated: November 29, 2007

COTCHETT, PITRE & McCARTHY

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By: /s/ Steven N. Williams

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San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

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Walter J. Lack (#57550)
Elizabeth L. Crooke (#90305)
Richard P. Kinnan (#123170)
ENGSTROM LIPSCOMB & LACK
10100 Santa Monica Blvd., 16th Floor
Los Angeles, CA 90067
Telephone: (310) 552-3800
Facsimile: (310) 552-9434

1 Dated: November 29, 2007

BOIES, SCHILLER & FLEXNER LLP

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3 By: /s/ Kenneth F. Rossman IV
4 John F. Cove, Jr. (#212213)
5 Kenneth F. Rossman IV (#237558)
6 1999 Harrison Street, Suite 900
7 Oakland, CA 94612
8 Telephone: (510) 874-1000
9 Facsimile : (510) 874-1460

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11 jcove@bsflp.com
12 krossman@bsflp.com
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

3 IT IS FURTHER ORDERED THAT, to conserve party and judicial resources, and
4 in light of the proceedings currently pending before the JPML to consolidate and transfer all
5 pending Pacific Air Transportation Cases to one Court, and pending motion in this Court to
6 consider whether additional cases should be related, this extension is available in ALL
7 RELATED ACTIONS (both current and to be related in the future) to any defendant that
8 provides written notice to plaintiff's counsel in such action of this Order and its intention to join
9 this extension, without further stipulation with counsel for plaintiff(s) in the related actions.

13 | Dated: November , 2007

Honorable Elizabeth D. Laporte
Judge of the United States District Court